

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of)

ICO SERVICES LIMITED)

Petition for Expedited Rule Making To)
Establish Eligibility Requirements for the)
2 GHz Mobile Satellite Service)

RM No. 9328

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

COMMENTS OF IRIDIUM, LLC

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August 27, 1998

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SUMMARY

Iridium LLC ("Iridium") herein submits its Comments on the above-captioned Petition for Expedited Rule Making ("Petition"), filed by ICO Services Limited ("ICO"). As discussed herein, Iridium supports a rule making proceeding to establish eligibility and service rules for the 2 GHz band, provided that any such rules -- including any band-plan adopted -- are equitable and genuinely procompetitive. However, to the extent that the Petition goes further and proposes rules and procedures that only serve ICO's private interest--not the public interest--Iridium must disagree.

ICO'S Petition is contrary to the public interest. The proposals advanced by ICO do not consider the varying needs and proposals of the applicants or the competing concerns and considerations that the Commission must balance. As demonstrated above, the ICO Petition is unnecessary, disruptive, and contrary to the public interest. Also, as demonstrated herein, the Commission should not depart from its customary procedures for resolving mutual exclusivity among satellite applicants. Moreover, ICO's specific proposal to limit access to the 2 GHz band by imposing a "new entrant" qualifications criterion is anticompetitive and wholly unwarranted. For these reasons, the Commission should deny the Petition.

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COMMENTS OF IRIDIUM, LLC

Iridium LLC ("Iridium"), by its attorneys, and pursuant to Section 1.405(a) of the Commission's rules, 47 C.F.R. § 1.405(a) (1997), hereby respectfully submits its Comments on the above-captioned Petition for Expedited Rule Making ("Petition"), filed July 17, 1998, by ICO Services Limited ("ICO").

I. INTRODUCTION

Nine parties have filed applications or letters of intent¹ seeking to provide mobile satellite service ("MSS") in the 2 GHz band. Those applications are pending. A number of petitions, comments, and responsive pleadings have been filed in connection with those applications. Also, pleadings are pending in the Commission's underlying 2 GHz MSS allocation proceeding, and recent legislation will apparently impact that proceeding. On July 17, 1998, ICO, one of the nine applicants, filed the above-captioned Petition, in which it made extraordinary proposals that ignore precedent and would have the Commission place ICO in a preferred position never before accorded to any similarly-situated U.S. applicant.

^{1/} Herein Iridium, for ease of reference, will refer to applications and letters of intent collectively as "applications."

Iridium supports a rule making proceeding to establish eligibility and service rules for the 2 GHz band, provided that any such rules -- including any band-plan adopted -- are equitable and genuinely procompetitive. Apparently not confident that the Commission can or will initiate such a proceeding, ICO has submitted its Petition.²

ICO's Petition is perplexing. The FCC has not given any indication that a rulemaking proceeding will not be forthcoming.

ICO's Petition is wholly unnecessary. Obviously there will be a rulemaking proceeding. The Commission has emphasized that there are not yet any specific eligibility and service rules for 2 GHz MSS. The only way such rules will be adopted is through a rulemaking proceeding, and the FCC has indicated repeatedly that one will be conducted in due course.

ICO's Petition is disruptive. Iridium is puzzled by the timing of ICO's Petition. If ICO truly desires expeditious processing of 2 GHz applications and adoption of rules, its Petition has the opposite effect, creating an unnecessary proceeding and pleading cycle that requires the Commission and the applicants to devote time and resources that could be better spent.

ICO's Petition has served its purpose. ICO has succeeded in catching the Commission's attention. Indeed, the ICO Petition was placed on public notice less than two weeks after it was filed! To the extent that ICO's Petition seeks to draw the

^{2/} ICO's seeming impatience with the FCC's established licensing process is surprising. To the best of Iridium's knowledge, ICO does not yet have a space segment license from any country, and it has only just commenced construction of its system. The Iridium system space segment license was issued by the U.S. in January 1995; yet some countries, including those with significant ICO investors, did not even commence licensing procedures for the Iridium system until construction of that system was substantially complete.

Commission's attention to the need for commencing a rulemaking proceeding to adopt service rules for the 2 GHz MSS service, Iridium wholeheartedly supports ICO's objective. However, to the extent that the Petition goes further and proposes rules and procedures that only serve ICO's private interest--not the public interest--Iridium must disagree.

ICO'S Petition is contrary to the public interest. The proposals advanced by ICO do not consider the varying needs and proposals of the applicants or the competing concerns and considerations that the Commission must balance.

II. THE COMMISSION SHOULD NOT DEPART FROM ITS CUSTOMARY PROCEDURES FOR RESOLVING MUTUAL EXCLUSIVITY AMONG SATELLITE APPLICANTS

Iridium is committed to working with all of the 2 GHz applicants and the Commission to ensure that as many applicants as possible have access to the band. The well-established process for resolving mutual exclusivity among satellite applications, depends, at its core, on the mutual efforts of the applicants to resolve spectrum and interference issues. Iridium is ready and willing to commence the difficult negotiations that lead to a band-sharing plan and ultimately Commission licensing and rulemaking decisions.

ICO, however, seems to want to turn the process on its head and complete spectrum assignments and service rules before the parties have even begun the difficult technical give and take expected by the Commission. In so doing, ICO's proposal ignores both the Commission's commitment to the World Trade Organization Agreement on Basic Telecommunications Services (WTO Agreement) and established U.S. procedures for processing competing satellite applications.

The WTO Agreement requires that the United States afford foreign-licensed systems from WTO member countries "national treatment." Non-U.S. systems from WTO member countries should expect to be able to participate in FCC licensing processes under the same terms as U.S. companies. ICO, however, asks not for "national treatment" but for special treatment of its application vis a vis the other 2GHz applicants accepted for filing in accordance with existing FCC procedures. The WTO Agreement does not require that the Commission tailor its process to benefit ICO or any other non-U.S. licensed applicant to provide it a competitive advantage in the spectrum assignment process.

ICO's proposal that the FCC should adopt eligibility rules, grant ICO a license, and then create service rules also ignores the clear Commission justification for requiring applicants to first attempt to resolve sharing among themselves. The Commission recently explained that both the long term investments required of satellite applicants and the lengthy international coordination procedures support its long established process whereby it first accepts applications, then resolves band sharing through applicant negotiations, and then adopts service rules as necessary:

Given these unique factors in licensing satellite services, the Commission regularly establishes cut-offs, accepts applications and creates processing groups before service rules are adopted or even before specific operating frequencies are established. We then rely heavily on the applicants to help develop service rules that allow them to share spectrum and expeditiously develop and deliver their new services to the public.³

³ Establishment of Rules and Policies for the Digital Audio Radio Satellite Service in the 2310-2360 MHz Frequency Band, Report and Order, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 12 FCC Rcd 5554, 5783 (1997)(footnote omitted).

The Commission has consistently followed this process, a process ICO seeks to avoid here. The Commission customarily has encouraged competing satellite applicants to attempt to resolve mutual exclusivity through private industry negotiations. For example, in the *Second Little LEO Report and Order*, the Commission specifically observed that

[i]n proceedings, such as this one, in which more applicants apply for spectrum than the available spectrum can accommodate, the Commission encourages applicants to work together to develop a spectrum sharing plan that accommodates all of the applicants, including new entrants. This approach is likely to promote competition and result in a more efficient use of the available spectrum for a particular service than if the Commission is required to choose which applicants will operate in the spectrum being licensed.⁴

The Commission has applied this methodology successfully in both the first and second Little LEO processing rounds,⁵ in the Big LEO proceeding,⁶ and in the processing round for GSO applicants in the Ka band.⁷

^{4/} *Amendment of Part 25 of the Commission's Rules to Establish Rules and Policies Pertaining to the Second Processing Round of the Non-Voice, Non-Geostationary Mobile Satellite Service*, 13 FCC Rcd 9111, 9118 ¶ 14 (1997) [*"Second Little LEO Report and Order"*].

^{5/} *See Amendment of the Commission's Rules to Establish Rules and Policies Pertaining to a Non-Voice, Non-Geostationary Mobile-Satellite Service*, 8 FCC Rcd 8450, 8450 ¶ 2 (1993) [*"First Little LEO Order"*] ("The parties' willingness to participate in the Commission's initial negotiated rulemaking process . . . has greatly assisted Commission staff and has streamlined this rulemaking process."); *see also Second Little LEO Report and Order*, 13 FCC Rcd at 9118.

^{6/} *See Big LEO Report and Order*, 9 FCC Rcd 5936, 5943 ¶ 9 ("The Commission conducted a negotiated rulemaking from January through April 1993 to assist it in developing technical rules for the MSS Above 1 GHz service.").

^{7/} *See Rulemaking to Amend Parts 1, 2, 21, and 25 of the Commission's Rules to Redesignate the 27.5-29.5 GHz Frequency Band, to Reallocate the 29.5-30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services*, 11 FCC Rcd 19005, 19018 ¶ 32, 19022 ¶ 40 (1996) (*First Report and Order and Fourth Notice of Proposed Rulemaking in CC Docket No. 92-297*) [*"28 GHz Band Report and Order"*] (Adopting band plan that "was the result of months of
(continued...)

In its Order allocating the 2 GHz band for generic MSS operations (the "2 GHz MSS Allocation Order"), the Commission expressly stated that it was deferring action on the technical parameters and licensing issues for MSS in the 2 GHz band.⁸ This decision reflects the Commission's well-founded belief that it should not impose, *a priori*, eligibility and service rules unless the competing applicants cannot resolve issues of mutual exclusivity among themselves. There is no reason to depart from long established precedent and practice here.

To date, the Commission has not initiated such negotiations among the existing 2 GHz MSS applicants. A negotiated solution that would afford all or most of the present applicants access to the 2 GHz MSS band would truly maximize competition and promote the public interest far better than the anticompetitive and exclusionary scheme ICO proposes. Iridium would welcome the opportunity to engage in such negotiations upon invitation from the Commission. Through such negotiations the applicants can attempt to harmonize the number of applications and all of the disparate characteristics of the proposals they embrace. If negotiations do not resolve mutual exclusivity and it becomes necessary to do so, the Commission should then undertake to establish substantive service and eligibility rules for 2 GHz MSS.

At the same time, as Iridium has noted previously, the Commission must expeditiously address the significant problem of access to European 2 GHz MSS spectrum that stems from the inconsistencies in global MSS spectrum allocations and

7/(...continued)

discussions with interested parties and filings in the proceeding.").

8/ 2 GHz MSS Allocation Order, 12 FCC Rcd 7388, 7388 (1997).

the scarcity of global MSS uplink spectrum.⁹ The Commission can and must aid the negotiation process among the parties by concurrently engaging the Conference of European Postal and Telegraph Administrations (the "CEPT") in a dialogue to address and resolve 2 GHz MSS spectrum access issues.

IV. THE PROPOSED OWNERSHIP ELIGIBILITY CRITERION DOES NOT PROMOTE COMPETITION

ICO urges the Commission to adopt as a threshold eligibility criterion for licensing in the 2 GHz MSS band a categorical preference for "new entrants" that would deny access to entities who have previously been assigned spectrum to provide MSS in the United States -- specifically, the Big LEO licensees.¹⁰ ICO's proposed "new entrant" eligibility criterion would be unprecedented and its adoption would effect a major change in Commission policy, eliminating potential competitors automatically, before there has been any determination that their spectrum needs cannot be technically accommodated. Indeed, the Commission has never foreclosed an incumbent satellite licensee from seeking additional spectrum in another proceeding. Moreover, the

9/ See Consolidated Comments and Petition to Deny of Iridium LLC, filed May 4, 1998, in connection with File Nos. 179-SAT-P/LA-97(16), *et al.*, at 4-6 ["Iridium Comments"]; Consolidated Reply of Iridium LLC, filed June 18, 1998, in connection with File Nos. 179-SAT-P/LA-97(16), *et al.*, at 3-5 ["Iridium Reply Comments"].

10/ Petition at 4-5. While ICO appears to indicate that "[a] few applicants" would be prepared to commence service in the near term if such an exclusionary criterion were adopted, *id.* at 4, its identification of only its own "concrete steps to offer MSS at 2 GHz" suggests that, in fact, ICO believes that only it would benefit from the new entrant standard it proposes. In any event, ICO can claim no advantage from its "concrete steps." The Commission has never required such pre-qualification steps by an applicant, and indeed, has rejected the use of such efforts to secure leverage in the Commission's licensing decisions. See *Streamlining the Commission's Rules and Regulations for Satellite Application and Licensing Procedures*, 11 FCC Rcd 21581, 21585 ¶ 9 (1996) (In waiving the construction permit requirement for satellite space stations, the Commission "underscore[d] . . . that any construction will be at the applicant's own risk, and we will not in any way consider the status of construction or expenditures made when acting on the underlying application.").

proposed "new entrant" qualification is neither justified by a concern that Big LEO licensees will warehouse spectrum nor would it be an equitable basis for distributing the available spectrum.

As it has in the past, ICO cites, as its only authority for the claim that the Commission has "recognized" the appropriateness of limiting consideration to new entrants, the Commission's statement in its Notice of Proposed Rule Making in the second Little LEO processing round.¹¹ However, as Iridium and others have previously observed, the Commission never adopted that proposal but instead allowed existing Little LEO licensees to obtain expansion spectrum.¹²

In fact, the Commission's experience in the Little LEO proceeding cited by ICO demonstrates that ICO's proposal is premature and unwarranted. The Commission acknowledged in the *Second Little LEO Report and Order* that private negotiations among competing applicants provide a more spectrum efficient, and thus superior approach to resolving band usage concerns than do exclusionary entry criteria formulated and imposed by the Commission.¹³

In support of its proposed "new entrant" requirement, ICO's Petition quotes the Commission's statement in the *Little LEO NPRM* that "competition . . . may be limited if an existing licensee obtains additional spectrum thereby excluding a new licensee from entering the . . . market."¹⁴ ICO completely overlooks the Commission's

^{11/} Petition at 5 & n.5 (citing *Amendment of Part 25 of the Commission's Rules to Establish Rules and Policies Pertaining to the Second Processing Round of the Non-Voice, Non-Geostationary Mobile Satellite Service*, 11 FCC Rcd 19841 (1996) [*"Little LEO NPRM"*]).

^{12/} See *Second Little LEO Report and Order*, 13 FCC Rcd at 9118.

^{13/} *Id.* ¶ 14.

^{14/} Petition at 5 (citing *Little LEO NPRM*, 11 FCC Rcd at 19846).

later observation in the *Second Little LEO Report and Order* that its concern about the exclusion of potential new entrants had been alleviated by the mutually-agreed upon spectrum sharing plan produced by the applicants' negotiations.¹⁵ ICO would have the Commission ban existing licensees before determining that "new" entrants cannot be accommodated.

Here, of course, the applicants have not yet attempted to achieve such a negotiated resolution to accommodate demands for 2 GHz MSS spectrum. Accordingly, the premise for ICO's new entrant proposal has not been established. There is simply no evidence at this time to suggest that ICO or any other "new entrant"¹⁶ will be excluded from entering the 2 GHz MSS market. Accordingly, ICO's proposal that the Commission restrict its consideration of the pending 2 GHz MSS applications and letters of inquiry only to so-called "new entrants" is simply unjustified at present.

ICO also attempts to bolster its request for a "new entrant" requirement by asserting that Big LEO licensees would only warehouse any expansion spectrum they might be awarded in the 2 GHz band, thereby impairing competition.¹⁷ This allegation is entirely without foundation. Specifically, ICO states that, of the four present applicants

^{15/} *Second Little LEO Report and Order*, 13 FCC Rcd at 9118 ¶ 14.

^{16/} It is unclear that ICO would even qualify as a new entrant under the definition that it advocates. As the Commission recognized in the *DISCO II Report and Order*, ICO is an affiliate of Inmarsat, an intergovernmental satellite organization ("IGO") with substantial MSS spectrum holdings in the U.S. and abroad. See *Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, 12 FCC Rcd 24094, 24154 n.283 (1997) ["*DISCO II Report and Order*"] ("For the purpose of this *Report and Order*, an IGO affiliate is an entity created by an IGO, in which an IGO and IGO signatories maintain ownership interests. ICO falls within our definition of an IGO affiliate."). In light of the close ties which bind ICO to Inmarsat, see Iridium Comments at 19-27; Iridium Reply Comments at 17-21, a strong argument can be made that ICO is not a "new entrant."

^{17/} Petition at 4, 5.

for 2 GHz spectrum who also hold spectrum in the 1.6/2.4 GHz spectrum bands (the "Big LEO band"), "[n]ot one . . . is providing MSS under its existing license."¹⁸

Apparently ICO includes Iridium, which is not licensed in the Big LEO band, in its calculation. Yet, as ICO is well aware, and indeed has previously conceded, Iridium has "made significant progress in constructing and launching [its] satellites."¹⁹ To date 74 Iridium satellites have been launched, and the Iridium system is scheduled to commence operations in 27 days! Insofar as Motorola and Iridium have far exceeded the performance milestones required by the Commission, completing construction and launch, and commencing operations, years before they were required to do so,²⁰ they may hardly be criticized for "warehousing" spectrum.

Moreover, contrary to ICO's argument, the Commission itself has already concluded that the 2 GHz spectrum should be available for expansion by existing Big LEO operators:

As a result of the . . . allocation of additional spectrum to MSS at 1990-2025 MHz and 2165-2200 MHz, in March of this year, unassigned spectrum with equivalent propagation characteristics [to that of the spectrum allocated to the Big LEO services] is now available either for new systems or for expansion of existing systems.

^{18/} *Id.* at 5. Thus, ICO asserts, it would be premature to grant additional spectrum to Big LEO licensees. *Id.*

^{19/} Consolidated Comments of ICO Services Limited, filed May 4, 1998, in connection with File Nos. 179-SAT-P/LA-97(16), *et al.*, at 11 ["ICO Comments"].

^{20/} See *Motorola Satellite Communications, Inc.*, 11 FCC Rcd 13952, 13960 (1996) (*Order and Authorization* in File No. 85-SAT-ML-96). The Commission required the first two satellites of the Iridium system to be completed by October 2000; construction of the remaining space stations to be commenced by October 1999; and the system to be fully operational by October 2002. *Id.* Accordingly, with the commencement of full commercial operations this September, Motorola and Iridium will have fulfilled these milestone obligations more than three years ahead of the prescribed deadline.

that could be used to provide service such as the Big LEO systems would provide.²¹

In light of the Commission's recognition that the limited spectrum initially allocated for Big LEO systems will not suffice to meet the growing demand for MSS service around the world, no basis exists to exclude Big LEO operators from receiving spectrum in this proceeding.

ICO's proposal to exclude Big LEO licensees is also inequitable. Indeed, ICO's warehousing rationale is especially ironic in view of (1) its own Letter of Intent, which requests access to the entire 70 megahertz of allocated spectrum in the band, and (2) its assertion in the Petition that applicants that meet its specified eligibility standards should be conditionally licensed to access "at least the entire common global 2 GHz MSS spectrum [*i.e.*, 20 megahertz of the allocated spectrum]."²²

In sharp contrast to these numbers, the Commission must remember that the entire allocation of spectrum shared by all Big LEO licensees consists of only 33 MHZ (1610-1626.5 MHZ and 2483.5-2500 MHZ).²³ The Iridium system's share of this 33 MHZ is only 5.15 MHZ (1621.35-1626.5 MHZ).²⁴ Thus, ICO would deny Iridium and the Big LEO licensees access to the 2 GHz MSS band to secure for ICO's own use a block of spectrum between 4-13 times greater in size. Such a result would be grossly

^{21/} *Mobile Communications Holdings, Inc.*, 12 FCC Rcd 9663, 9673 (1997) (Order and Authorization) (emphasis added). The need for such expansion spectrum to meet anticipated demand for MSS services is clear. The Commission has observed that even "the Radiocommunication Sector of the ITU estimates that up to 206 megahertz of additional spectrum will be needed for MSS by the year 2005." *2 GHz MSS Allocation Order*, 12 FCC Rcd at 7394-95.

^{22/} Petition at 9.

^{23/} See *Big LEO Report and Order*, 9 FCC Rcd 5936 (1994).

^{24/} See *Motorola Satellite Communications, Inc.*, 10 FCC Rcd 2268, 2272 ¶ 25 (Int'l Bur. 1995) (Order and Authorization).

inequitable and entirely unjustified, particularly because ICO would impose this spectrum cap at the outset, before any determination is made as to the number of proposals that can be accommodated technically.

The Commission must carefully consider the anticompetitive impact of ICO's proposal to adopt eligibility rules now but defer until later consideration of all other service rules for the 2 GHz MSS -- including a spectrum band plan.²⁵ ICO proposes this bifurcated approach to rule making purportedly to allow "the expeditious licensing or authorization of those new entrant 2 GHz MSS applicants whose systems are well developed and ready to initiate service near term."²⁶ Yet, there is absolutely no evidence that any such applicants exist (other than perhaps ICO itself).

In fact, ICO's proposal will limit other applicants' access to the 2 GHz MSS band. Specifically, the Petition overlooks the fact that, under ICO's plan, proponents of MSS systems wishing to employ CDMA access technology (Globalstar, MCHL, Constellation, Iridium, and Celsat) will be all but excluded from using the band. The Commission has understood that TDMA and CDMA MSS systems cannot operate on the same frequencies in the same locations.²⁷ To achieve the benefits of spectrum efficiency that are unique to CDMA systems, such systems operate best over relatively wide bandwidths, not in a series of smaller spectrum "chunks" that would emerge from the ICO proposal. This is the reason that the Commission adopted the band segmentation plan it did in the *Big LEO Order*. To adopt other than a comparable band

^{25/} Petition at 8-9.

^{26/} *Id.* at 8.

^{27/} See, e.g., *Big LEO Report and Order*, 9 FCC Rcd at 5954. ICO itself has made this very point to the Commission. See ICO Comments at 15-16; see also ICO's Consolidated Response to Reply Comments, filed June 18, 1998, in connection with File Nos. 179-SAT-P/LA-97(16), *et al.*, at 7-8.

segmentation plan at 2 GHz would be tantamount to the Commission choosing technical winners and losers absent any marketplace decisions.

ICO's strategy appears to be to exclude from consideration other applicants with sufficient resources to implement near-term competitive service in the 2 GHz MSS band, and then, under the auspices of its conditional license, to lay a claim to the entire 70 megahertz of 2 GHz MSS spectrum, thereby compelling other applicants to negotiate with it for access to the band. However, it should be noted that a cornerstone of ICO's proposal is to operate interstitially, between the frequencies employed by the incumbent 2 GHz fixed service operators.²⁸ While such an approach to spectrum management may work well for one satellite provider (ICO in this case) and helps that one provider avoid incumbent relocation issues, coordination for additional MSS systems becomes very problematic. Spectrum available for future providers will be limited not only by the spectrum occupied by ICO and incumbent fixed service operators, but also by the spectrum that must remain unused in order for ICO and the fixed service incumbents to operate with a minimum of mutual interference.²⁹ Once again, ICO's proposal advances only its purely private--not the public--interest.

V. CONCLUSION

As demonstrated above, the ICO Petition is unnecessary, disruptive, and contrary to the public interest. Moreover, ICO's specific proposal to limit access to the 2

^{28/} See Supplemental Comments of COMSAT Corporation in ET Docket 95-18 (March 14, 1996) and supporting comments of ICO (contained in Joint Comments of the MSS Coalition in ET Docket 95-18 (May 17, 1996)). Iridium opposed this "picket fence" proposal as impractical for all but one MSS provider. See Supplemental Reply Comments of Iridium Inc. in ET Docket 95-18 at 5 (May 17, 1996).

^{29/} Another possible consequence of ICO's proposal is that it could enable ICO to escape paying its share of the costs to relocate incumbent fixed service licensees now occupying the band, thereby placing the entire burden of such costs on later entrants.

GHz band by imposing a "new entrant" qualifications criterion is anticompetitive and wholly unwarranted. For these reasons, the Commission should deny the Petition.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Bridget Y. Monroe, a secretary for the law firm of Verner, Liipfert, Bernhard, McPherson, and Hand, Chartered, hereby certify that this twenty-seventh (27th) day of August, 1998, I caused a copy of the foregoing "Comments of Iridium, LLC" to be sent, by first class United States Mail, postage prepaid (* or by hand delivery), to each of the following:

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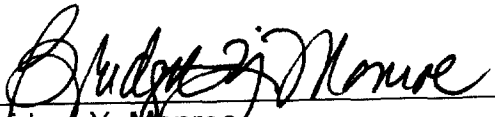
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August 27, 1998


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